

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

OCLC, Inc.,

Plaintiff,

v.

**Baker & Taylor, LLC and Bridgeall
Libraries, Ltd.,**

Defendants.

Case No. 2:25-cv-00309

Judge Edmund Sargus, Jr.

**Magistrate Judge Elizabeth Preston
Deavers**

**[SUPPLEMENTAL PROPOSED] AGREED SCHEDULE FOR
PRELIMINARY INJUNCTION PROCEEDINGS**

As directed by the Court during the April 23, 2025 conference, Plaintiff OCLC, Inc. (“Plaintiff”) and Defendants Baker & Taylor, LLC and Bridgeall Libraries, Ltd. (collectively, “Defendants”) jointly submit the following proposed schedule for resolving Plaintiff’s Motion for Preliminary Injunction (“P.I. Motion”). The parties respectfully request that this proposed schedule replace the proposed schedule submitted to the Court on April 17, 2025 (ECF No. 24), and that the Court enter an order setting out the dates listed below.

Parties formally serve discovery requests	April 28, 2025
Parties exchange written discovery responses	May 23, 2025
Both Defendants file motions to dismiss	May 27, 2025
Plaintiff files briefs in opposition to motions to dismiss	June 17, 2025
Document production substantially completed	June 27, 2025
Defendants file reply briefs in support of motions to dismiss	July 1, 2025
Depositions completed	August 1, 2025

Defendants file opposition to P.I. Motion

August 15, 2025

Plaintiff files reply in support of P.I. Motion

August 29, 2025

Preliminary Injunction Hearing

Mid-September 2025

Respectfully submitted,

/s/ Jeffrey M. Walker

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CERTIFICATE OF SERVICE

On April 24, 2025, this document was filed electronically with the Clerk of the United States District Court for the Southern District of Ohio, Eastern Division, which will electronically serve a copy of the foregoing on all counsel of record for all parties.

/s/ Jeffrey M. Walker

Jeffrey M. Walker, Trial Attorney